

**EPA Review Comments and Responses**  
**Data Quality Management Plan**  
**Draft Document Dated January 17, 2018 (submitted to EPA for review)**

EPA Review Comments dated February 2, 2018

*Pre-RD AOC Group responses dated February 20, 2018 (blue font, italics)*

30 calendar days = March 9, 2018

Following are the United States Environmental Protection Agency's (EPA's) comments on the document titled Agency Review Draft *Pre-Remedial Design Investigation and Baseline Sampling Portland Harbor Superfund Site Data Quality Management Plan* (herein referred to as the DQMP) prepared by AECOM Technical Services and Geosyntec Consultants, Inc. (Geosyntec) on behalf of Portland Harbor Pre-RD Group. The DQMP describes activities necessary to comply with the Pre-Remedial Design Investigation Studies Work Plan ([PDI Work Plan] Geosyntec 2017).

EPA understands the purpose of the DQMP is to describe the work activities necessary for collecting, creating, managing, distributing, and submitting high quality tabular and geospatial data. The purpose of EPA's review is to assess if the DQMP will generate tabular and geospatial data that meet EPA submittal requirements as described in the PDI Work Plan and related reference documents.

EPA's comments are categorized as "Primary," which identify concerns that must be resolved to achieve the objective; "To Be Considered," which, if addressed or resolved, would reduce uncertainty, improve confidence in the document's conclusions, and/or best support the objectives; and "Matters of Style," which substantially or adversely affect the presentation or understanding of the technical information provided in the document.

**Primary Comments**

1. A quality assurance (QA)/quality control (QC) section must be added to the DQMP document that describes the QA/QC program and how quality control checks are implemented. A quality assurance coordinator, who is responsible for quality on the project, must be identified and added to *Table 3 Data Manager Key Roles and Responsibilities*. QC responsibilities must be added as an additional column in this table and assigned to each team member. QC activities must cover the management of newly collected data and historical data and responsibilities assigned so that quality control checks are independent reviews and staff are not reviewing their own work products. If the QA/QC information is included in a separate document, a reference to that document must be made.

*Pre-RD AOC Group Response: A new QA/QC section (Section 8) will be added to the document that will specifically describe QA/QC procedures for tabular data; Section 6.3.4 (and Appendix F), which references GIS deliverables QA/QC, will be moved to this new Section 8. A brief sub-section will also be included to address other project content QA/QC procedures, which will largely point to other programmatic documents like the individual Field Sampling Plans, etc. Amy Dahl is the overall QA Manager for the project; her name/role will be added to Table 3, and QC responsibilities will also be added for other roles defined in the table. Another table will be added that identifies other documents (and appropriate sections) where QA/QC activities are discussed. Specific data content QC reviewers (subject matter experts) will be identified as well.*

2. Section 2.4 and Table 3: The *DRAFT Portland Harbor Data Management Plan* requires each of the performing parties to designate a data manager. DQMP Section 2.4 and *Table 3 Data Manager Key Roles and Responsibilities* discuss the data management team but do not specify a data manager. The DQMP

must identify the individual who would serve as a contact with EPA's Scribe.NET coordinator as described in Section 2.2.2 Data Manager in the *DRAFT Portland Harbor Data Management Plan*.

*Pre-RD AOC Group Response: Mike Surowiec is the overall Data Manager and point of contact with EPA's Scribe.NET coordinator; he is identified in Table 3 as the "Lead Data Manager." The table will be clarified to name only one data manager, and other persons referenced in the table will be identified as data analysts and/or their roles clearly distinguished.*

3. Section 3.1.5: Appendix A of the *DRAFT Portland Harbor Data Management Plan* lists the required data elements for a Region 10 Scribe.NET submittal. DQMP Section 3.1.5, EPA Data Submittal Standards, must reference the *DRAFT Portland Harbor Data Management Plan* and state if the required data elements can be incorporated in the Scribe.NET submittal for newly collected data. Data elements that cannot be included in the Scribe.NET submittal must be documented with the reason why the data element cannot be captured. At the start of sampling, EPA must be notified of any data elements that cannot be collected. This will save time during the data auditing process in Scribe. EPA will not need to request missing data if they already have been flagged as not required. It is understood that data elements may be missing from historical data.

*Pre-RD AOC Group Response: AECOM has reviewed the Scribe.NET specifications referenced in the comments and is confident that all the required data can be exported from the EQuIS project database and provided to EPA in the Scribe.NET submittal. EQuIS has a Scribe.NET export utility and, to the extent possible, Scribe.NET values will be seeded into the EQuIS project database. The Lead Data Manager will confirm that any elements that are not compliant with the Scribe.NET schema will be identified and communicated to EPA prior to the start of any sampling program. These statements and a reference to the "DRAFT Portland Harbor Data Management Plan" will be added to the DQMP.*

4. Section 6.2.2, page 20, paragraph 1: This section of the DQMP notes that expedited delivery of data may be made. The DQMP must clarify if preliminary data are being released prior to completion of quality review checks and, if so, how versions of preliminary and final data products will be controlled and reconciled.

*Pre-RD AOC Group Response: Early delivery of data is an internal control practice only and does not reflect the final data that goes to EPA. Unless directed otherwise, AECOM only intends to transmit final data (that has been subjected to all applicable QC checks) to EPA via the Scribe.NET format.*

5. Section 6.3.4: This section of the DQMP describes the QA/QC process for geospatial deliverables and references a checklist in Appendix F. This section must state that the geospatial deliverables will meet the *U.S. EPA Region 10 Geographic Information Systems (GIS) Data Deliverable Guidance*, the *National Geospatial Data Policy Procedure for Geospatial Metadata Management from 2010*, and the *National Geospatial Data Policy from 2008*. Requirements from the references documents must be added to the checklist in Appendix F.

*Pre-RD AOC Group Response: Geospatial deliverables will meet these standards. The references will be added to Section 6.3.4, and checklist items will be added to the Appendix F form.*

6. Table 3: An additional role of project chemist must be added to *Table 3 Data Manager Key Roles and Responsibilities* of the DQMP. The activities of the project chemist are described in the text in Section

5.6.3 of the DQMP, but the role and its responsibilities are not described in *Table 3 Data Manager Key Roles and Responsibilities*.

*Pre-RD AOC Group Response: The project chemist role and responsibilities will be added to Table 3.*

## **To be Considered Comments**

1. The PDI Work Plan requires that all deliverables require signed certification with the designated statement in Section 5.5 of the PDI Work Plan. The DQMP should document how this requirement will be met with tabular and geospatial data submittals.

*Pre-RD AOC Group Response: The certification statement will be added to the Transmittal Sheet in Appendix E, and appropriate language describing how the certification requirement will be met with tabular and geospatial data submittals will be added to the DQMP.*

2. Table 4: The sample ID scheme presented in this table should be checked for consistency with Table 4 of the QAPP dated 1/18/18. For example, the sample location ID for porewater in the DQMP (e.g., PDI-P001) differs from the sample station number in the QAPP (e.g., B001 or S001).

*Pre-RD AOC Group Response: DQMP Table 4 will be cross-checked against QAPP Table 4 and corrected for consistency.*

3. Appendix B: The *DRAFT Portland Harbor Data Management Plan* Section 2.3.3 on locational data lists that hydrologic unit codes (HUCs) have been added to the valid values in the Region 10 Scribe template. These valid values should be added to the Scribe reference tables in Appendix B.

*Pre-RD AOC Group Response: The valid values for HUCs will be added to Appendix B.*

4. Appendix F: For geospatial derived products, such as volumetric calculations or concentration isopleths, the calculations or data interpretations should be verified by an independent reviewer. Confirmation of the review should be added to the checklist in Appendix F of the DQMP.

*Pre-RD AOC Group Response: Checklist items verifying an independent check was performed, including date, reviewer name, and signature, will be added to the Appendix F form.*

## **Matters of Style Comments**

1. Section 2.4 Data Manager Roles and Responsibilities of the DQMP under the Section 2 Information Repository Configuration should become its own section in the document.

*Pre-RD AOC Group Response: Section 2.4 will be promoted / made into its own Section 3.*

2. Appendix B: This appendix of the DQMP contains both EQUIS and Scribe database documentation. Each database system should have its own appendix.

*Pre-RD AOC Group Response: EQUIS and Scribe.NET will be separated into their own appendices.*

## **References:**

EPA. 2017. *DRAFT Portland Harbor Data Management Plan*.

EPA. 2013. U.S. EPA Region 10 Geographic Information Systems (GIS) Data Deliverable Guidance.

EPA. 2010. National Geospatial Data Policy Procedure for Geospatial Metadata Management. October.

EPA. 2008. National Geospatial Data Policy. August 24.

Geosyntec. 2017. Work Plan Portland Harbor Pre-Remedial Design Investigation Studies Portland Harbor Superfund Site. December 14.